

ATTACHMENT A

DEFINITIONS

1. The terms “document” or “documents” means any written, recorded, electronic, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, email, computer storage devices or any other media, including but not limited to memoranda, notes, minutes, records, photographs, correspondence, telegrams, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, responses to questionnaires, charts, graphs, statements, notebooks, handwritten notes, applications, agreements, books, pamphlets, periodicals, appointment calendars, notes, diaries, records and recordings of oral conversations, work papers, and also including but not limited to, originals and all copies which are different in any way from the original whether by interlineation, receipt stamp, notation, indication of copies sent or received, or otherwise, and drafts, which are in the possession, custody or control of you, your present or former agents, representatives, or attorneys, or any and all persons acting on your behalf, including documents at any time in the possession, custody or control of such individuals or entities or known by you to exist.

2. The term “concerning” means relating to, referring to, describing, evidencing, or constituting.

DOCUMENTS TO BE PRODUCED

1. Any and all documents concerning the medical or health care information and medical or health care records of Pamela Graeber (“Graeber”) [SSN#180-36-2179] relating to her heart condition and/or related treatment or relating to other matters which may have a historical or causal connection to her heart condition and/or related treatment, including, but not limited to, the reports of physicians, including psychiatrists, psychologists, therapists, social workers, or any other mental or physical health care professional, and any related materials of any kind, including hospital records, charts, x-rays, technicians’ reports and related materials, physicians’ notes, including psychiatrists’, psychologists’, social workers’ or nurses’ notes, lab reports, test results, audio tapes, video tapes, index cards, billing records, and insurance forms and records. The released information is to be used in connection with the above-referenced litigation.